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CHASE HOME FINANCE, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

HOAN PHAM,)	Case No. CV 13-01843 HRL
)	
Plaintiff,)	STIPULATION TO MODIFY CASE
)	MANAGEMENT ORDER AS TO EXPERT
vs.)	DISCOVERY CUTOFF; PROPOSED
)	ORDER
REDLINE RECOVERY SERVICES, LLC;)	
JP MORGAN CHASE BANK, N.A.; and)	
CHASE HOME FINANCE, LLC,)	
)	
Defendants.)	

Plaintiff HOAN PHAM (“Plaintiff”) and Defendants JPMORGAN CHASE BANK, N.A.,
successor by merger to CHASE HOME FINANCE, LLC (“Chase”) and REDLINE RECOVERY
SERVICES, LLC (“Redline”) (collectively, the “Parties”), by and through their respective counsel of
record, hereby stipulate and agree as follows:

WHEREAS, on July 31, 2013, this court issued a Case Management Order providing for an
expert discovery cut-off date of March 18, 2014, with designation of experts with reports due on
February 11, 2014, and designation of rebuttal experts with reports due on March 4, 2014;

1 WHEREAS, the parties are currently engaged in settlement discussions, and wish to extend the
2 expert witness-related deadlines in order to continue to facilitate those discussions;

3 WHEREAS, the parties are desirous of changing the deadlines for the designation of experts
4 with reports to March 18, 2014, the designation of rebuttal experts with reports to April 8, 2014, and
5 the expert discovery cut-off date to April 22, 2014;

6 WHEREAS, good cause exists to enter an order modifying the expert discovery cut-off date in
7 that it will not affect any other date in the current Case Management Order, including the date of the
8 Pretrial Conference;

9 IT IS HEREBY STIPULATED by and between all parties to this action through their
10 respective counsel that the discovery cut-off date should be reset to April 22, 2014, with the deadline
11 for the designation of experts with reports reset to March 18, 2014, and the deadline for the
12 designation of rebuttal experts with reports reset to April 8, 2014.
13
14

15
16 DATED: February 11, 2014

/s/ Jessica Luhrs

17 PHILIP A. MCLEOD
18 JESSICA LUHRS
19 KEESAL, YOUNG & LOGAN
20 Attorneys for Defendant JPMORGAN CHASE
21 BANK, N.A., successor by merger to
22 CHASE HOME FINANCE, LLC

23 DATED: February 11, 2014

/s/ James F. Hetherington

24 JAMES F. HETHERINGTON
25 GOODMAN NEUMAN HAMILTON LLP
26 Attorney for Defendant REDLINE RECOVERY
SERVICES, LLC

//

1 DATED: February 11, 2014

/s/ Annette D. Kirkham

2 ANNETTE D. KIRKHAM

3 FAIR HOUSING LAW PROJECT

LAW FOUNDATION OF SILICON VALLEY

4 Attorney for Plaintiff HOAN PHAM

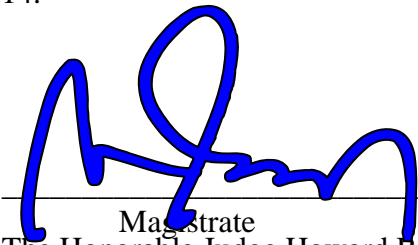
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6 *Filer's Attestation: Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, Jessica Luhrs hereby*
7 *attests that concurrence in the filing of this document has been obtained.*
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~~[PROPOSED]~~ ORDER

PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS HEREBY ORDERED THAT the Case Management Order issued July 31, 2013 should be and hereby is modified to reflect a Exert Witness Discovery Cutoff date of April 22, 2014.

IT IS SO ORDERED.

Dated: February 11, 2014



Magistrate
The Honorable Judge Howard R. Lloyd